

From: Stacey Vucko
To: a.urso@courierexpress1.com
Subject: Michelle Marski's claims and response to your voicemail
Date: Thursday, February 7, 2019 8:29:26 PM
Attachments: [2-7-19 A. Urso.pdf](#)

Dear Mr. Urso,

My law firm represents Michelle Marski. I received your voicemail today regarding Courier Express One, Inc.'s laptop. I will coordinate a time with my client for her to drop the laptop off at my office. I will then contact you to arrange a time for pickup from my office.

Attached, please find a document preservation demand relating to Ms. Marski's claims. If Courier Express One has retained counsel, please forward your counsel's contact information to me so that I may direct all future communications to your counsel. Likewise, please direct any communications regarding this matter to my law firm rather than attempting to communicate with Ms. Marski directly.

Sincerely,

Stacey Vucko

Stacey Vucko
Vucko Law
4901 Forest Ave., Suite 2
Downers Grove, Illinois
60515
(312) 522-2517

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VUCKO LAW TEL. (312) 522 2517

4901 FOREST AVE., SUITE 2 SVUCKO@VUCKOLAW.COM
DOWNERS GROVE, IL 60515

February 7, 2019

Via Certified Mail - Return Receipt Requested and Email

Courier Express One, Inc.
SV Wilson Logistics, Inc.
PRECC, Inc. f/k/a PremierCC Inc.
Dispatch Express, Inc.
Vertek, LLC
c/o Anthony Urso
300 N. Martingale Rd., Ste. 200
Schaumburg, IL 60173
a.urso@courierexpress1.com

Re: Michelle Marski's Demand to Preserve Documents

Dear Mr. Urso:

Courier Express One, Inc., SV Wilson Logistics, Inc., PRECC, Inc. f/k/a PremierCC, Inc., Dispatch Express, Inc. and Vertek, LLC (collectively "the Noticed Parties") are on notice of my client's, Michelle Marski's, claims against the Noticed Parties arising from their discriminatory conduct toward Ms. Marski during her employment period, including the Noticed Parties' violation of Illinois and federal wage and hours laws. Pursuant to federal and Illinois law, Ms. Marski demands that the Noticed Parties preserve all documents and other evidence that refers to or relates to her employment period and her claims.

The Noticed Parties and their employees are not to destroy, conceal, erase or alter in any manner any documents, information, paper or electronic data or other evidence pertaining or relating to Ms. Marski's claims, including, but not limited to, the following categories of documents or information:

1. All information in or relating to any and all of Ms. Marski's personnel files, including her personnel file maintained by PremierCC and Courier Express One, including documents relating to her job performance and positions held;
2. All documents and communications relating to Ms. Marski and her employment with Courier Express and/or the Noticed Parties;
3. All documents relating to Ms. Marski's request for intermittent FMLA leave, including doctor's notes and communications and FMLA paperwork;
4. All documents and data relating to the phone call between Mr. Urso and Ms. Marski which took place on February 5, 2019 on Courier Express One's employee Gianna Ruffalo's cellular phone, including call log and cell phone records for both Ms. Ruffalo's personal and business cell phones;

Mr. Anthony Urso

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5. All documents relating to the Noticed Parties' workplace policies, including regarding discrimination, harassment, hiring, termination and performance reviews and evaluations;
6. All documents reflecting Ms. Marski's wages and hours worked, including payroll records and time records;
7. Any and all communications, including, without limitation, emails and text messages, relating to Ms. Marski or her employment, including, without limitation, text messages and emails between Mr. Urso and Ms. Marski and text messages between Mr. Urso and any past or present employee of the Noticed Parties;
8. Any documents relating to complaints by Ms. Marski to the Noticed Parties or their personnel, including regarding workplace discrimination, failure to pay wages and/or harassment; and
9. Any other documents, information or communications which relate to Ms. Marski and her claims.

Ms. Marski's demand includes, without limitation, paper documents and electronic data, as defined by Federal Rule of Civil Procedure 34, such as emails, voicemails, text messages and other communications, data stored by online backup services, data generated and stored on computers and electronic storage media of any type.

In addition, by this letter and pursuant to Illinois law, we hereby demand a copy of Ms. Marski's complete personnel file, including her payroll records. Kindly mail the file to my office immediately at Vucko Law, 4901 Forest Ave., Suite 2, Downers Grove, IL 60515.

Very truly yours,

Stacey Vucko